NO. 95252-3

SUPREME COURT OF THE STATE OF WASHINGTON

RICHARD BOYD,

Petitioner,

v.

CITY OF OLYMPIA, *ET AL.*,

Respondents.

DEPARTMENT OF LABOR & INDUSTRIES' ANSWER TO AMENDED PETITION FOR REVIEW

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I. INTRODUCTION

The Department of Labor & Industries issues hundreds of thousands of orders and receives millions of documents for the nearly one hundred thousand industrial insurance claims it receives annually. The Industrial Insurance Act allows "a written request for reconsideration" of a Department order. RCW 51.52.050(1). To be such a protest, the long-standing rule of the Board of Industrial Insurance Appeals, now adopted by the Court of Appeals, is that the document must reasonably put the Department on notice that the party submitting the document is requesting action inconsistent with the decision of the Department.[1]

Boyd does not argue that this Court should apply a different rule. Instead, he limits his argument to the facts of this particular case—asking this Court to admit new evidence he failed to submit at hearing and to apply liberal construction to view the evidence in the light most favorable to him. Liberal construction does not require courts to dispense with Industrial Insurance Act's requirement that appealing parties have the burden to establish their right to relief; rather, it is a tool to construe ambiguous statutes. Here, there is no ambiguous statute and Boyd does not

[1] *Boyd v. City of Olympia*, 1 Wn. App. 2d 17, 30-31, 403 P.3d 956 (2017); *see also In re Mike Lambert*, No. 91 0107, 1991 WL 11008451, *1 (Wash. Bd. Ind. Ins. App. Jan. 29, 1991).

dispute the rule, only its application. Contesting an application of law to fact presents no ground warranting review under RAP 13.4.

II. COUNTERSTATEMENT OF THE ISSUES

Review is not warranted in this case, but if review were accepted, the issue presented would be:

> To be construed as a protest, a document must reasonably put the Department on notice that the party submitting the document is requesting action inconsistent with the Department's decision. The February 2014 chart note at issue here did not reference a claim number or industrial injury and discussed a condition unrelated to the industrial injury. Did the chart note put the Department on notice that the doctor disagreed with closure of the claim?

III. COUNTERSTATEMENT OF THE CASE

A. The Department Closed Boyd's Low-Back Claim After He Received Treatment

Boyd injured his low back on October 22, 2009, while employed by the City of Olympia. Certified Appeal Board Record (AR) 369. The City is self-insured, which means it administered Boyd's claim. *See* AR 3-7. Boyd received medical treatment for his injury and then the Department closed his claim on October 10, 2013, with a permanent partial disability award for his back. AR 328, 369.

On November 15, 2013, John Green, MD, one of the physicians treating Boyd, provided a chart note he created on September 24, 2013 noting that he believed a third independent medical examination might be

necessary to resolve two previous conflicting independent medical examination impairment ratings for the low-back condition. AR 475-79. Dr. Green's note also assessed the following conditions: (1) left internal and external "snapping" hip; (2) status post left arthroscopic debridement and osteoplasty; and, (3) chronic low back pain with primarily right-sided lower extremity residual. AR 475. He referred Boyd to Ashwin Rao, MD, to perform a steroid injection in the left hip. *See* AR 475.

On January 2, 2014, counsel for the City sent a letter to the Department indicating that the September 24, 2013 chart note that asked for a further independent medical examination might be considered a protest. AR 328.[2] The City then filed its own protest to the closing order to ask that the Department address the inconsistent medical opinions about the permanent partial disability award. AR 328.

On January 15, 2014, the City's third party administrator received a letter from Dr. Green agreeing that the hip symptoms described in the September 24, 2013 chart note were unrelated to Boyd's October 2009 industrial injury. AR 233-34. On January 27, 2014, the Department addressed the City's protest and provided an updated closing order for

[2] A protest must be received by the Department (or self-insured employer on behalf of the Department) within 60 days from the communication of the Department order. *See* RCW 51.52.050(1); WAC 296-20-09701; *In re Harry D. Pittis*, No. 88 3651, 1989 WL 168610, *3-4 (Wash. Bd. Ind. Ins. App. Dec. 13, 1989). Green's chart note was received by the City's third party administrator within 60 days. *See* AR 475-79.

Boyd's low-back claim that reduced his impairment award. AR 224. The order was sent to Boyd's attorney and to his attending physician, Michael Lee, MD. *See* AR 224-25, 370. Two days later, Boyd protested the January 27, 2014 order through his attorney. AR 370.

B. The Department Addressed Boyd's Protest and Affirmed Claim Closure

On February 18, 2014, the Department affirmed the closing order. AR 226-27; *see* AR 371. The Department sent a copy of this order to the City, Boyd (through his attorney), and Dr. Lee, the attending physician on Boyd's claim at that time. AR 227. The closing order was communicated to Boyd through his counsel and he did not protest or appeal the closing order within 60 days as provided by RCW 51.52.050 and RCW 51.52.060. AR 271, 371. Boyd's attending physician also did not submit a protest or appeal. AR 371.

Eight months later Boyd obtained new counsel and filed a late appeal of the February 18, 2014 order to the Board on October 20, 2014, based on the claim that a chart note generated by Dr. Rao was an unaddressed protest on his behalf. *See* AR 371.

C. Dr. Rao Prepared the February 13, 2014 Chart Note While Treating Boyd's Unrelated Hip Condition

On February 13, 2014, Dr. Rao examined Boyd for his unrelated left hip complaints and performed an injection of Boyd's left hip.

AR 332-35. The chart note reflected that Dr. Rao was seeing Boyd on referral from Dr. Green and that Dr. Green had suggested steroid injections into the left hip. AR 333. Dr. Rao provided his chart note along with a bill to the City. AR 370.

Five days later on February 18, 2014, the Department closed the claim. AR 226. The Department did not send a copy of the closing order to Dr. Rao because he was not the attending physician and the record does not reflect that he otherwise reviewed the order before he mailed the February 13, 2014 chart note to the City's third party administrator. *See* AR 227, 559.

On February 24, 2014, the third party administrator received the chart note reflecting the February 13th visit to Dr. Rao. AR 353. The chart note discussed an injection that he provided for the hip condition on February 13th and suggested that the worker continue home physical therapy and follow up in 4-6 weeks to see if another injection was necessary. AR 335. The chart note contained no reference to the claim number, no reference to the industrial injury, no reference to the employer of injury, and contained nothing that explicitly indicated disagreement with closing the claim. *See* AR 332-36.[3] The third party administrator

[3] Dr. Green's chart note had one notation at the top of the page that said "Occupational Health." AR 332.

knew from Dr. Green's earlier chart note that the hip condition was not related to the industrial injury. AR 370.

The third party administrator then sent a letter to Dr. Rao asking him to clarify why he had sent the chart note in. AR 330. The letter attached Dr. Green's September 24, 2013 chart note (confirming that the hip conditions were unrelated) and the January 15, 2014 letter (confirming he was not recommending any further treatment for the industrial injury) for his review. AR 330. The letter asked for clarification because "[i]t is unclear whether there was simply miscommunication regarding the billing party, or whether you intended to protest/appeal the closing order." AR 330. The letter then told the doctor how to protest the closing order if he disagreed with it. AR 330, 370-71. Dr. Rao did not respond to this letter. AR 371.[4]

D. The Board and Trial Court Concluded That Dr. Rao's Chart Note Did Not Constitute a Protest and So the Closing Order Was Final and Binding

The parties cross-moved for summary judgment at the Board. AR 188. In his proposed decision, the industrial appeals judge concluded

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[4] During the litigation before the Board, Dr. Rao provided a declaration that clarified that (1) his chart note did not address whether he felt that "the need for injections or further treatment for the hip was proximately caused by the industrial injury under SC-77017[;]" (2) in forwarding his February 13, 2014 chart note and bill to the third party administrator he did not intend to protest the February 18, 2014 closing order; and (3) he has "no opinion as to whether or not Mr. Boyd's hip symptoms are related to the industrial injury covered under Claim No. SC-77017 . . . ." AR 559.

that Dr. Rao's chart note was not a protest, finding that the chart note did not notify the Department that its order was incorrect because the chart note "contains no claim number, contains no reference to the alleged industrial injury, contains no reference to the employer of injury, no protest language, and no specific recommendation of further treatment ..." AR 190. Boyd petitioned for review to the Board. AR 120-33. With his petition for review, Boyd submitted a new declaration with more than a dozen new documents that were not provided during the cross-motions for summary judgment. AR 135-37. The Board rejected Boyd's untimely submissions, concluding that Boyd failed to present "any evidence or argument that by the exercise of reasonable diligence, he could not have discovered all of the proposed evidence and presented it with his summary judgment motion." AR 5. It also found that "Dr. Rao's chart note did not put the City of Olympia or the Department of Labor & Industries on reasonable notice that closure of Mr. Boyd's claim was being challenged." AR 6.

Boyd appealed to superior court and the superior court affirmed the Board's decision, finding that the chart note did not put the City or the Department on reasonable notice that the doctor was challenging closure of the claim. CP 3-5, 47-49.

E. The Court of Appeals Concluded That Dr. Rao's Chart Note and Bill Did Not Reasonably Put the Department on Notice That Dr. Rao Was Protesting the Department's Order

The Court of Appeals affirmed the superior court, concluding that the trial court and Board correctly dismissed Boyd's appeal as untimely. *Boyd v. City of Olympia*, 1 Wn. App. 2d 17, 33, 403 P.3d 956, 963-964 (2017). The Court of Appeals reasoned that "to be a protest the communication must reasonably put the Department on notice that the worker is taking issue with some Department decision." *Id.* at 30. To make this determination, the court should "consider the content of the communication itself and information relevant to it that was in the possession of Department employees or agents involved in handling the claim at the time of the communication." *Id.* The court explained that specific words or terminology are not required and that Dr. Rao's intentions do not play a role in deciding whether the communication should be treated as a protest. *Id.* at 31.

Applying these rules, the court concluded that Dr. Rao's chart note "would not reasonably put the Department on notice that Rao was protesting the February 18 order closing Boyd's claim for a low back injury." *Id.* It reasoned that the chart note and bill were for the hip condition and "Boyd has not shown how this type of injection was somehow related to his low back injury" or that a bill requesting the

Department pay for uncovered treatment would transform the chart note into a protest. *Boyd*, 1 Wn. App. 2d at 31. The court also rejected the notion that the mere reference to "occupational health" or the "bald statement that Boyd's history is complicated by back pain" would transform the chart note for unrelated hip maladies into one that would reasonably put the Department on notice of a protest of a decision related to a low back injury. *Id.* at 32.[5]

IV. REASONS WHY REVIEW SHOULD BE DENIED

A Department order becomes final unless an aggrieved person, including a doctor, protests or appeals within 60 days of communication of the order to that person. RCW 51.52.050, .060; *Marley v. Dep't of Labor & Indus.*, 125 Wn.2d 533, 537, 886 P.2d 189 (1994). For a document that is received within 60 days to be considered a "written request for reconsideration"—a protest—the Board has long required that the document be reasonably calculated to put the Department on notice that the party submitting the document is requesting action inconsistent with the decision of the Department. RCW 51.52.050(1); *Lambert*, 1991 WL 11008451 at *1. The Court of Appeals largely adopted the *Lambert*

[5] The court also noted that the Department was aware that Dr. Green had referred Boyd to Dr. Rao for the treatment of the hip and that Dr. Rao's note does not reference a claim number, any of the Department's orders, or his employer so "it makes it more difficult to see how the Department could have reasonably been put on notice of a protest of an order relating Boyd's low back injury." *Id.* at 32.

analysis and applied it to the facts of this case to reject Boyd's claim that documents provided by a treating provider put the Department on notice that he was seeking to have the Department reconsider the Department's order closing his workers' compensation claim.[6]

Boyd presents no reason warranting Supreme Court review. First, the decision of the Court of Appeals does not conflict with any decision of the Supreme Court or Courts of Appeals because this is the first appellate decision confirming the *Lambert* standard. Second, there is no conflict with prior appellate decisions or a "due process question" regarding liberal construction because liberal construction is a tool to aid in construing an ambiguous statute and there is no ambiguous statute at issue here.[7] Finally, this is not an issue of substantial public interest—the parties all agree that the *Lambert* standard should apply and this well-reasoned formulation of the rule does not diminish an aggrieved party's right to protest a decision.

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[6] None of the parties ask this Court to consider Dr. Rao's declaration in determining whether he intended to protest the order or was an "other person aggrieved" under RCW 51.52.050(2)(a) and there is no need for this Court to consider these abandoned arguments now.

[7] Boyd only makes a passing reference to due process and thus this Court should not consider it. *See* RAP 10.3(a)(6); *Havens v. C & D Plastics, Inc.*, 124 Wn.2d 158, 169, 876 P.2d 435 (1994); *Nor-Pac Enters., Inc. v. Dep't of Licensing*, 129 Wn. App. 556, 570-71, 119 P.3d 889 (2005).

A. Review Need Not Be Granted Because the Court of Appeals' Decision Does Not Conflict With Any Other Appellate Decision

The Board has long applied the rule set forth in its significant decision *Lambert*, but no appellate court before *Boyd* adopted a specific standard to determine when an ambiguous document is a protest. Because there is no prior decision addressing this issue, there is no conflict. More to the point, no party disputes the Court's formulation of the *Lambert* rule. Rather, Boyd argues that the Court failed to read liberal construction into the rule, but he misunderstands the application of liberal construction. Pet. 9-10. His misreading of the rule of liberal construction does not create a conflict.

Under the *Lambert* rule, a written document qualifies as a protest if the Department receives it in a timely manner and it is "*reasonably calculated*" to put the Department on notice that the party submitting the document is requesting action inconsistent with the decision of the Department. *Lambert*, 1991 WL 11008451 at *1 (emphasis added). The Court of Appeals generally adopted this approach, reasoning that "to be a protest the communication must *reasonably put* the Department on notice that the worker is taking issue with some Department decision."[8] *Boyd*, 1

[8] The court merely took issue with the "calculated" language in *Lambert*, which it reasoned suggested tribunals should look at the subjective intentions of the party submitting the document rather than the objective information available to the Department. *Boyd*, 1 Wn. App. 2d at 30. But *Lambert* also applied an objective standard

Wn. App. 2d at 30 (emphasis added). Any difference between the Board's analysis and the Court's analysis is inconsequential and the parties apparently do not take issue with the Court of Appeals' analytical framework.[9] The parties agree that courts should "consider the content of the communication itself and information relevant to it that was in the possession of Department employees or agents involved in handling the claim at the time of the communication" rather than look at subjective intent of the sender. *See id.* at 31; Pet. 6; Ans. 14. Although Boyd contended in his briefing below that under the *Lambert* standard a court should examine only the four corners of the written document to determine whether it reasonably puts the Department on notice, Boyd does not seek review in his petition of this holding of the Court of Appeals. *Boyd*, 1 Wn. App.2d at 31. Likewise, the City no longer argues that the Court should have considered Dr. Rao's subjective intent. *See* Ans. 14.

Boyd's request for review boils down to the Court of Appeals' purported failure to employ liberal construction to construe the documents as a protest. Boyd's demand to revive his untimely appeal through liberal

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even if it used the word "calculated." *See Lambert*, 1991 WL 11008451 at *1 ("Upon receipt of the October 4, 1990 letter [the Department] *knew, or should have known*, that the claimant was disputing the Department's right to share in his third party recovery and was thereby aggrieved by the order of September 7, 1990."(emphasis added)).

[9] This is also consistent with this court's recognition that it gives "great deference" to the Board's interpretation of the Industrial Insurance Act. *See Weyerhaeuser Co. v. Tri*, 117 Wn.2d 128, 138, 814 P.2d 629 (1991).

construction of the documents is without merit. Pet. 9-12. Liberal construction "does not apply to questions of fact but to matters concerning the construction of the statute." *Ehman v. Dep't of Labor & Indus.*, 33 Wn.2d 584, 595, 206 P.2d 787 (1949); *Hastings v. Dep't of Labor & Indus.*, 24 Wn.2d 1, 13, 163 P.2d 142 (1945). The court does not apply the liberal construction rule in in a workers' compensation case where the statutory language is unambiguous. *Raum v. City of Bellevue*, 171 Wn. App. 124, 155, 286 P.3d 695 (2012).

Boyd does not claim that RCW 51.52.050 is ambiguous (it is not); rather, he suggests that the language of the *chart note* is ambiguous and it should be construed in his favor. Pet. 10-11. But Boyd does not disagree with the Court of Appeals' rule that a chart note must reasonably put the Department on notice of the party's desire to protest, he disagrees with the application of the Court's rule to his facts. Pet. 11 ("*Looking at the relevant facts*, Mr. Boyd was not fixed and stable, he needed further treatment and he was to return to determine whether the nature of the treatment would include physical therapy or even more invasive injections." (emphasis added)). Determining whether a document reasonably put the Department on notice of a request inconsistent with the order is a factual determination, not the construction of an ambiguous statute, and therefore liberal construction is inapplicable here.

None of the cases Boyd cites support his claim that there is a conflict here with the longstanding requirement to construe ambiguous provisions of Industrial Insurance Act liberally. The *Spivey* Court simply reiterated the longstanding rule that the Industrial Insurance Act is remedial in nature and the *Michaels* Court simply discussed liberal construction as a backdrop to a discussion about the construction of an industrial insurance immunity statute. *Spivey v. City of Bellevue*, 187 Wn.2d 716, 726, 389 P.3d 504 (2017); *Michaels v. CH2M Hill, Inc.*, 171 Wn.2d 587, 598, 257 P.3d 532 (2015).[10]

Finally, Boyd's demand to resolve the "doubts [in the ambiguity of putative protest] in favor of the worker" conflicts with the burden of proof set forth in Industrial Insurance Act for all appellants. *See* Pet. 14. The Industrial Insurance Act states unequivocally that the appealing party must establish a prima facie case for the relief sought in such an appeal.

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[10] *Spivey* and *Larson v. City of Bellevue* were consolidated on review by the Supreme Court, so the same principles apply to Boyd's reliance on *Larson v. City of Bellevue*, 188 Wn. App. 857, 355 P.3d 331 (2015), *overruled on other grounds by Clark County v. McManus*, 185 Wn.2d 466, 372 P.3d 764 (2016). Neither of the other cases cited by Boyd for an alleged conflict, *Harbor Plywood Corp. v. Dep't of Labor & Indus.*, 48 Wn.2d 553, 295 P.2d 310 (1956), and *Wendt v. Dep't of Labor & Indus.*, 18 Wn. App. 674, 571 P.2d 229 (1977), discuss liberal construction at any length.

RCW 51.52.050(2)(a) ("In an appeal before the board, the appellant shall have the burden of proceeding with the evidence to establish a prima facie case for the relief sought in such appeal."); *see* WAC 263-12-115(2)(a) (Board regulation that requires the appealing party to introduce all evidence in the party's case-in-chief); *see also Lightle v. Dep't of Labor & Indus.*, 68 Wn.2d 507, 510, 413 P.2d 814 (1966) (claimants must prove the right to receive benefits). Nothing in RCW 51.52.050 provides for differential factual treatment of appellants in industrial insurance appeals and Boyd provides no reasoned analysis for doing so.

B. Boyd Fails to Show That This Court Should Allow the Introduction of New Evidence He Failed to Present at Hearing

None of the factual evidence in pages 7-8 or 15-19 of Boyd's Petition for Review is part of the record on appeal. Boyd wrongly asks the Court to take "judicial notice" of claim file documents that he failed to submit in his appeal at the Board. Pet. 7-8. Judicial notice applies to facts "not subject to reasonable dispute" because they are either "generally known" or "capable of accurate and ready determination by resort to sources whose accuracy cannot reasonably be questioned." ER 201. Judicial notice does not apply to disputed hearsay facts submitted to the Department during claim adjudication. *See id.*

More to the point, Boyd's additional evidence should not be considered for at least three other reasons. First, the superior court only considers evidence that was submitted at the Board, absent a procedural irregularity at the Board. RCW 51.52.115; *Raum*, 171 Wn. App. at 139. Second, the Board correctly followed its own rule when it declined to consider new evidence after the hearing on the merits. AR 5; WAC 263-12-135 ("No part of the department's record or other documents shall be made part of the record of the board unless offered in evidence."). Finally, appellate courts only consider evidence adduced in the proceedings below absent extraordinary circumstances. *See* RAP 9.11(a).[11]

Boyd has provided no argument in support of this request and he cannot meet the 6-part test in RAP 9.11(a). This Court should decline to consider the new evidence submitted and ignore arguments based on evidence not contained in the record.

C. Boyd Fails to Present an Issue of Substantial Public Interest Because the Court of Appeals Correctly Applied a Reasonable and Workable Rule to the Facts in the Record

There is no issue of substantial public interest raised by the Court applying the law to facts of Boyd's case. The Court of Appeals correctly concluded that the court looks at the document and objective evidence

[11] An appellate court also does not simply accept hearsay facts offered by one party in post-trial briefing—it "will ordinarily direct the trial court to take additional evidence and find the facts based on that evidence." RAP 9.11(b).

before the Department to determine whether the Department was "reasonably put on notice" that the filing is a request for reconsideration rather than a stray document. *Boyd*, 1 Wn. App. 2d at 30-31. By not disputing this rule, Boyd only challenges the application of it to the facts of his case: an argument that does not present an issue of substantial public importance.

Applying the Board's time honored and well-reasoned rule, the Court correctly affirmed the superior court's finding that Dr. Rao's chart note did not put the Department on notice. First, the note was for an unaccepted hip condition, rather than the accepted low-back condition. *Boyd*, 1 Wn. App. 2d at 31; AR 332-36. The chart note discusses the earlier surgical treatment (arthoscopic labral debridement) for his left hip, but there is no evidence in the record that shows that this treatment was related to his industrial injury and Boyd failed to show they were related. *See* AR 332-36. Second, the trial court properly rejected that mere reference to "occupational health" or the "bald statement that Boyd's history is complicated by back pain" would put the Department on notice of any relationship. *Boyd*, 1 Wn. App. 2d at 31. Third, the Department was aware that Dr. Green had referred Boyd to Dr. Rao for the treatment of the hip condition and that Dr. Green had already indicated that the treatment was unrelated to the covered, low-back condition. AR 370. All of this in

combination with the fact that Dr. Rao's note does not reference a claim number, any of the Department's orders, or his employer, "makes it more difficult to see how the Department could have reasonably been put on notice of a protest of an order relating Boyd's low back injury." *See* AR 332-36; *Boyd*, 1 Wn. App. 2d at 31.

Finality applies to the benefit of all parties. *See Kingery v. Dep't of Labor & Indus.*, 132 Wn.2d 162, 170, 937 P.2d 565 (1997) (plurality) (unappealed decision by the Department is "final and binding on *all parties* . . .") (emphasis added). Boyd does not like the outcome here, but the same rule applies to all aggrieved parties and under different circumstances workers would be harmed by a rule that treats every misdirected document as a protest that delays the payment of benefits or holds-up treatment. This Court need not grant review to upend the Court of Appeals' well-reasoned decision applying the long-standing Board rule.

V. CONCLUSION

Review is not warranted because the Court of Appeals' decision does not implicate any of the reasons for review provided by RAP 13.4. The decision of the Court of Appeals does not conflict with any decision of the Supreme Court or Courts of Appeals because the decision is the first to apply a longstanding principle in workers' compensation law and liberal construction does not apply here. There is also no issue of substantial

public importance because the Court of Appeals' well-reasoned formulation of the rule correctly balances the parties' rights to protest with parties' rights to finality. This Court should deny review.

RESPECTFULLY SUBMITTED this 5th day of February, 2018.

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